

1 **GABRIEL L. GRASSO, ESQ.**
2 **State Bar Number 7858**
3 **231 South Third Street, Suite 100**
4 **Las Vegas, Nevada 89101**
5 **(702) 868-8866**
6 **Attorney for HOFFMAN**

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9 **UNITED STATES DISTRICT COURT**
10 **IN AND FOR THE STATE OF NEVADA**

11
12 **UNITED STATE OF AMERICA,**

13 **Plaintiff,**

14 **vs.**

15 **KELE ELIZABETH HOFFMAN,**

16 **Defendant.**

17 **Case No.: 2:11-CR-00257-JCM-GWF**
18 **UNOPPOSED MOTION TO ALLOW**
19 **TRAVEL AND ORDER TO ALLOW**
20 **TRAVEL**

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22 The Defendant, KELE ELIZABETH HOFFMAN, through his attorney of record,
23 GABRIEL L. GRASSO, moves to allow Ms. Hoffman to travel for the holiday season.
24 Counsel is moving to allow Ms. Hoffman to travel to Carlsbad, California and stay two
25 nights at the residence of her boyfriend's parents, Mr. and Mrs. James Camp, for the
26 Christmas Holiday from December 24, 2011 to December 26, 2011. I have contacted
27 both Pretrial Services Officer Alison McCurdy and attorney for record for the United
28 States of America, Amber Craig, and both are unopposed to this motion. As such, we
29 ask the Court to allow Ms. Hoffman to travel for the holidays. All other conditions of the
bond and conditions of release are to remain the same.

1 Executed: December 20, 2011

1 RESPECTFULLY SUBMITTED BY:

1 _____
2 */s/ Gabriel L. Grasso*
3 **GABRIEL L. GRASSO**
4 **Attorney for Defendant**

ORDER

IT IS HEREBY ORDERED that the Defendant, KELE ELIZABETH HOFFMAN, may travel to Carlsbad, California and stay two nights at the residence of her boyfriend's parents, Mr. and Mrs. James Camp, for the Christmas Holiday from December 24, 2011 to December 26, 2011. All other conditions of the bond and conditions of release are to remain the same.

IT IS SO ORDERED:

Craig H. Hause
UNITED STATES DISTRICT JUDGE
DATED: December 21, 2011

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2 **PROOF OF SERVICE**
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6 I, Mary Jo Fata, am an employee of Gabriel L. Grasso, P.C. I am over the
7 age of 18 and not a party to the within action; My business address is **231 S. Third**
8 **St., Suite 100, Las Vegas, NV 89101.**
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11 On December 20, 2011, at Las Vegas, Nevada I served the following documents:
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14 **Notice of Motion and Motion to Modify Sentence**
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17 on the interested parties in this action by FACSIMILE SERVICE.
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20 AMBER M. CRAIG
21 US ATTORNEY'S OFFICE
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